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December 15, 2020

**VIA ECF**

Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *In re Citibank August 11, 2020 Wire Transfers*, Case No. 20-cv-06539 (JMF)

Dear Judge Furman:

We write pursuant to the Court's Order that the parties complete their citizenship investigation and file a comprehensive list of all entities or persons whose citizenship is attributable to Defendants. ECF No. 191.

We confirm that Defendants Allstate Investment Management Company, Brigade Capital Management LLC, Greywolf Loan Management LP, New Generation Advisors LLC, Symphony Asset Management LLC, Tall Tree Investment Management, and ZAIS Group LLC are completely diverse. Set forth on Appendix A to this letter, please find a comprehensive list of all entities or persons whose citizenship is attributable to these Defendants.

We cannot confirm the complete diversity of Defendants Bardin Hill Loan Management LLC, HPS Investment Partners, LLC, and Medalist Partners Corporate Finance LLC ("Other Defendants"), for the reasons set forth in prior correspondence, including because the specific information is not yet obtained from relevant third party members and partners outside of the Defendants' control.<sup>1</sup>

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<sup>1</sup> Medalist Partners Corporate Finance LLC has one member (an LLC) that is ultimately wholly owned by a publicly-owned and traded Delaware LLC, NYSE: JMP.

Respectfully submitted,

*/s/ Benjamin I. Finestone*

Benjamin I. Finestone